

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

<b>UNITED STATES OF AMERICA</b>	*	<b>CRIMINAL NO. 10-338</b>
<b>v.</b>	*	<b>SECTION: C</b>
<b>CAM T. HANG</b>	*	

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**FACTUAL BASIS**

Should this matter have gone to trial, the Government would have proved beyond a reasonable doubt, through the introduction of competent testimony and admissible tangible exhibits including the testimony of special agents of the Federal Bureau of Investigation (“FBI”), employees of the Gulf Coast Claims Facility (“GCCF”) and others, the following facts to support the allegations charged in the Indictment now pending against the defendant, **CAM T. HANG**.

On April 20, 2010, an explosion and fire occurred on the Deepwater Horizon, an oil rig in the Gulf of Mexico where BP had been drilling a well. An employee of the GCCF would testify that in May 2010 through August 23, 2010, BP established the GCCF for the purpose of administering, mediating and settling certain claims of individuals and business for losses incurred as a result of the Deepwater Horizon incident. Specifically, the GCCF began receiving and processing such claims, on or about August 23, 2010 and BP ceased receiving and processing claims for losses incurred as a result of the Deepwater Horizon incident. The GCCF required any individual

filing a claim on behalf of a business for a temporary or permanent loss or reduction in profits due to the oil spill to be a lawful owner or an authorized operator or employee of that business on or after April 20, 2010 and to submit documents to prove that the business lost profits as a result of the oil spill. Emergency Advance Payments for damages resulting from the oil spill were available through November 23, 2010.

Evidence would be introduced that on or about April 9, 2009, the defendant, **CAM T. HANG**, sold C.H. Food Mart, Inc., a business located at 404 Third Street, Kenner, LA 70065 to C.N., the owner and operator of Food Express, 404 Third Street, Kenner LA.70065, (formerly known as C.H. Food Mart, Inc). C.N. would testify that on and after April 20, 2010, the defendant, **CAM T. HANG** was neither the lawful owner nor an authorized operator or employee of C.H. Food Mart, Inc.

A GCCF employee would testify that on or about September 12, 2010, the defendant, **CAM T. HANG**, did submit and caused to be submitted, an application for Emergency Advance Payment to the GCCF for business losses resulting from the Deepwater Horizon oil spill, falsely and fraudulently stating she was doing business as C.H. Food Mart, Inc., a “seafood restaurant” on April 20, 2010. The defendant, **CAM T. HANG** also submitted and caused to be submitted false and fraudulent information to the GCCF, claiming her business, C.H. Food Mart, Inc, experienced loss of income in the amount of \$42,000.00 as a result of the Deepwater Horizon oil spill and she was entitled to reimbursement for such loss. A certified copy of defendant’s GCCF claim form with the loss of business income claim in the amount of \$42,000.00 would be offered as evidence at trial.

On or about September 25, 2010, the GCCF sent via federal express, a commercial interstate carrier, an envelope containing an Emergency Advance Payment from the GCCF, check number 00034877, made payable to the defendant, C.H. Food Mart, Inc. and **CAM T. HANG**, in the amount of \$42,000.00 and addressed from the GCCF, P.O. Box 9658, Dublin, Ohio, 43017-4958 to the defendant at 404 Third Street, Kenner, LA 70065.

On November 5, 2010, **CAM T. HANG** was interviewed by Special Agents from the Federal Bureau of Investigation regarding her GCCF claim. **CAM T. HANG** told investigators that C.N. the new owner of the store, receive the GCCF check made payable to defendant and accidentally opened it and sent the check back to the GCCF, accusing **HANG** of fraud. C.N. gave **HANG** a copy of the check stub with “void” and “fraud” written on it. A copy of the check and cover letter would be offered as further evidence at trial.

**CAM T. HANG** admitted to investigators that after she saw the amount of the check GCCF had sent her and her name clearly written on the check, she became “greedy” and wanted the money so she could use it for her children or to start another business. **HANG** further admitted that she directed her daughter to write a letter to GCCF requesting they re-issue the check. A copy of a September 29, 2010 letter to the GCCF signed by **CAM T. HANG** requesting that a new check be directly deposited into her checking account would be offered as evidence at trial.

Both the Government and the defendant, **CAM T. HANG**, do hereby stipulate and agree that the above facts set forth a sufficient factual basis for the crime to which the defendant is pleading guilty and that the government would have proven these facts beyond a reasonable doubt at trial.

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CAM T. HANG  
Defendant

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DATE

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VALERIE JUSSELIN  
Counsel for Defendant

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DATE

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JULIA K. EVANS  
Assistant United States Attorney

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DATE